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October 17, 2023

VIA NEW JERSEY LAWYERS SERVICE

Hon. Christine M. Gravelle
United States Bankruptcy Court for the District of New Jersey
Clarkson S. Fisher Federal Courthouse
402 East State Street
Trenton, New Jersey 08608

Re: In Re: Allen Middleton
Bankruptcy Case No.: 19-15753 CMG
Our File No.: 10290-5

U.S. BANKRUPTCY COURT
FILED
TRENTON, NJ
OCT 18 2023
CLERK
BY: CLERK
S. JUDGE

Dear Judge Gravelle:

We represent Creditor, The Oaks at North Brunswick Condominium Association, Inc. (the "Association"), in the above-referenced matter.

The hearing concerning debtor, Allen Middleton's request for confirmation of a modified Chapter 13 Plan is scheduled for November 1, 2023.

The Association objects to the proposed modified Plan that debtor's counsel filed with the Court on September 7, 2023. As of September 30, 2023, the post-petition amount due to the Association is \$15,937.50, which exceeds the amount stated in the proposed Plan. Also, the Association seeks to file a lien against the debtor's real property with the county clerk's office.

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As such, we request that the court deny the debtor's proposed modified Chapter 13 Plan in its current form.

Respectfully submitted,
HUESTON McNULTY, P.C.

Anthony J Chirles Jr

By: _____
ANTHONY J. CHIRLES JR., ESQ.

AJC/agf
Encl.

cc: Kevin Delyon, Esq. (Via Email)
Albert Russo, Standing Chapter 13 Trustee (Via First Class Mail)

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